

February 28, 2014

US EPA RECORDS CENTER REGION 5



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**BY E-MAIL TRANSMISSION AND
FEDERAL EXPRESS**

W. Owen Thompson
Remedial Project Manager
Superfund Remedial Response Section Seven
USEPA Region 5, SR-6J
77 W. Jackson Boulevard
Chicago, IL 60604

**Re: Detrex Corporation Source Area (OU5) – Fields Brook
Superfund Site, Ashtabula, Ohio**

Dear Mr. Thompson:

I write in response to your February 20, 2014 correspondence requesting copies of various documents to be placed in the Administrative Record for the Fields Brook Superfund Site, which you could not readily locate. I am enclosing the documents you requested except as may be otherwise noted. For consistency and convenience, I have utilized the same references found on the original *Attachment to Fields Brook Action Group ("FBAG") Letter to USEPA dated February 11, 2014*, a copy of which is attached. (Please be advised that the February 11th list differs from the list circulated under my letter dated February 26, 2014, transmitting comments to the Detrex ESD. The February 26th list was updated to reflect changes and clarifications as of that date.)

1. "DNAPL and Groundwater Recovery Pilot Test," Woodward Clyde, September 9, 1996. We are searching for a file copy of this document and will be supplemented separately if it is available.
2. "Fields Brook Floodplain-DNAPL-Impacted Soils Risk Characterization," Gradient, June 6, 2001. Enclosed as Attachment A to the referenced letter in Item 3 below.

3. "Fields Brook Superfund Site- DNAPL Cutlines-Floodplain Wetland Areas," de maximis, inc. letter to Terese Van Donsel, June 6, 2001. Enclosed as Attachment B to the June 6th letter.
4. "State Road Bridge Maintenance Work Plan," CRA, March 2003. Enclosed.
5. "Contamination Source Identification and Delineation Plan," de maximis, inc., June 29, 2005. Enclosed.
6. "Supplemental DNAPL Source Identification and Delineation Plan," de maximis, inc, August 8, 2005. Enclosed.
7. "Ground Penetrating Radar Survey for Utility Location and Clay Depth," Hager Geoscience, Inc., August 8, 2005. Enclosed.
9. "DNAPL Presentation," de maximis, inc., October 11, 2005. Enclosed.
10. "Remedial Design/Remedial Action Work Plan for Resolution of DNAPL Releases," URS, Oct 21, 2005; Resulting Supplemental Investigation Report; DS Tributary Supplemental Investigation Report. Enclosed. **Please note that the report lists two follow up reports that were to be generated by URS and should be included in the Administrative Record, specifically the 'Resulting Supplemental Investigation Report' and 'DS Tributary Supplemental Investigation Report.' The FBAG has not received either of those reports.**
14. "Detrex Data," e-mail to Terese Van Donsel from Robert Rule, Feb 13, 2007, and attached Technical Memorandum from Dr. B.H. Kueper, February 4, 2007. Enclosed.
15. "Supplemental Remedial Action Implementation Report – EU6 and EU8," de maximis, inc., March 2008, e-mail to Terese Van Donsel from Robert Rule, April 2, 2008. Enclosed.
16. "Conceptual Plan for Relocation and Restoration of Fields Brook," de maximis, inc., letter to Terese Van Donsel, September 15, 2008. Enclosed.
17. "Remedy Performance Monitoring Results," Gradient, November 25, 2008, e-mail to Terese Van Donsel from Robert Rule, December 1, 2008. Enclosed.
18. "Detrex DNAPL Analysis," - Memorandum to FBAG Technical Committee, Gradient, December 9, 2008. Enclosed.

23. "Assessment of the Detrex Source Control Remedy and DNAPL Migration Pathways to Fields Brook," Gradient, December 1, 2009. Enclosed.
30. "FBAG Comments on URS Report Dated September 29, 2011, Field Brook Superfund Site, Ashtabula, Ohio (Draft)." 2p., Gradient, September 29, 2011. This draft document with comments was incorporated into Document No. 31 ["FBAG Comments on URS Report Dated October 13, 2011, Field Brook Superfund Site, Ashtabula, Ohio." 4p., Gradient, October 13, 2011]. Please note that the draft document was not submitted to the Agency.

With respect to your 'Comments on Documents,' the response to each of the four questions is yes and therefore no additional documents are provided.

In addition, the FBAG would like to add the 'Statement of Position to the US EPA on Behalf of the FBAG Concerning DETREX Contamination in Exposure Unit 8, Fields Brook Superfund Site' to the Administrative Record. It was transmitted by e-mail to Peter Felitti on September 5, 2006. **A copy is enclosed as document no. 40.**

If you have any further questions concerning these matters, please do not hesitate to contact me.

Very truly yours,


Ralph E. Cascarilla
On behalf of the FBAG

REC/rd

Enclosures

cc w/o enc: Richard Mason
Gerard Caron
Wayne Reiber
Joseph A. Heimbuch
cc w/enc: Robert W. Rule